

**BEFORE THE**  
**Federal Communications Commission**  
**WASHINGTON, D.C.**

In the Matter of	)	
	)	
Reporting Requirements for U.S. Providers of	)	IB Docket No. 04-112
International Telecommunications Services	)	
	)	
Amendment of Part 43 of the Commission's Rules	)	

**REPLY COMMENTS OF SPRINT CORPORATION**

Sprint Corporation ("Sprint") hereby submits its reply comments in the above-captioned proceeding. Sprint supports the positions taken in this proceeding by the other major U.S. facilities-based international carriers, AT&T and MCI, in support of the elimination or streamlining of unnecessary or obsolete reporting requirements and in opposition to proposed reporting requirements which would increase the burdens on U.S. carriers. Sprint disagrees with these carriers, however, with regard to retention of circuit-status reports, but does agree that, if these reports are retained, they should be simplified to the greatest extent possible and should be applied even-handedly to all cable facilities owners.

**I. THE COMMISSION SHOULD NOT INCREASE THE TRAFFIC AND REVENUE REPORTING REQUIREMENTS ON U.S. CARRIERS AND SHOULD ELIMINATE UNNECESSARY REQUIREMENTS.**

Both AT&T and MCI argue that the Commission should not adopt recommendations by the International Bureau and Wireline Competition Bureau staffs that would require U.S. carriers to separate wholesale traffic received from other U.S. carriers from retail traffic received from U.S. end-users and would require a separation of "route specific" revenues (*i.e.*, per-minute or per-call charges) from "non-route specific" revenues (calling plans charges, minimum monthly

charges, non-recurring charges, etc.).<sup>1</sup> Sprint agrees that these new requirements would require reporting carriers to devote additional resources to the preparation of these reports and may in fact require costly changes in internal record-keeping and accounting procedures. All three of the major U.S. international carriers are under intense competitive and fiscal pressure, with continuing reductions in force and decreasing revenues and margins in long-distance services, and to devote increasingly scarce resources to new and unproven regulatory reporting efforts is simply an uneconomic and unpleasant prospect. Moreover, as AT&T points out, the justification for these additional requirements presumes a pro-active regulatory posture which is not justified in the current competitive environment among U.S. carriers in international services.<sup>2</sup> The staff recommendations discussed above should therefore not be adopted. Similarly, Sprint agrees with AT&T that the proposal that Section 43.61 (a) reports distinguish among the types of termination of IMTS traffic (traditional settlements or ISR) is at odds with the Commission's deregulatory initiative in the recent *ISP Reform Order*,<sup>3</sup> and should not be adopted.<sup>4</sup>

Sprint is pleased to see that there is a consensus among the major U.S. international carriers that the Section 43.61(b) reports no longer serve any useful purpose and should be eliminated.<sup>5</sup> The Commission should act expeditiously to remove this out-of-date and burdensome reporting requirement from non-dominant U.S. international carriers.

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<sup>1</sup> Comments of AT&T at 4-8; Comments of MCI at 4-5.

<sup>2</sup> Comments of AT&T at 7-8.

<sup>3</sup> International Settlements Policy Reform, IB Docket No. 02-234, FCC 04-324 (rel. Mar. 30, 2004).

<sup>4</sup> Comments of AT&T at 9.

<sup>5</sup> *Id.* at 9-10; Comments of MCI at 6-8.

## **II. THE COMMISSION SHOULD ELIMINATE ANNUAL CIRCUIT-STATUS REPORTING OR, AT A MINIMUM, SIMPLIFY THIS REPORTING REQUIREMENT.**

Both AT&T and MCI suggest that the current circuit-status reports are “useful” and should be retained.<sup>6</sup> Sprint disagrees. As Sprint pointed out in its initial comments, these reports provide no information that is not available to the Commission by other means, and the need for such information has greatly diminished with the increase in cable capacity and routes.<sup>7</sup> Moreover, as AT&T points out, the current reports cover less than one-fifth of total available cable capacity,<sup>8</sup> so it is difficult to perceive the usefulness of the totality of the information currently reported. The Commission should re-evaluate its need for such information and eliminate this reporting requirement.

As Sprint stated in its initial comments, if circuit-status reporting requirements are to be retained, then they should also be applied to non-common carriers that own cable facilities. Sprint disagrees with MCI that the determination whether such circuits provide “telecommunications” should be the linchpin in determining whether such circuits should be reported or not.<sup>9</sup> Given changes in technology and regulatory dispositions, that determination may not provide adequate certainty. Sprint supports AT&T’s suggestion that all entities that are required to be applicants for a cable landing license under Section 1.767(h) of the Commission’s rules should be subject to any circuit-status reporting requirements which succeed those of

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<sup>6</sup> Comments AT&T at 11; Comments of MCI at 8.

<sup>7</sup> Comments of Sprint at 2.

<sup>8</sup> Comments of AT&T at 11.

<sup>9</sup> See Comments of MCI at 9.

Section 43.82.<sup>10</sup> In addition, Sprint agrees with AT&T that there is no need for any such successor requirements to include reporting by service categories, as such distinctions are increasingly obsolete due to developments in digital technologies.<sup>11</sup>

### III. CONCLUSION

For the reasons given above, Sprint respectfully requests that the Commission adopt the proposals and make the clarifications explained in the foregoing.

Respectfully submitted,

SPRINT CORPORATION



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<sup>10</sup> Comments of AT&T at 12-13.

<sup>11</sup> *Id.* at 11.